

Advisory Bulletin

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Subject:

Pipelines in a Common Right-of-Way, Parallel Right-of-Way, or Cross a Railroad Right-of-Way



US Department of Transportation
Research and Special Programs Administration

400 Seventh Street, SW.
Washington, DC 20590

PIPELINE SAFETY ADVISORY BULLETIN

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Date: 02/23/94

To: Gas and Hazardous Liquid Pipeline Operators

Subject: Pipelines in a Common Right-of-Way, Parallel Right-of-Way, or Cross a Railroad Right-of-Way

Purpose:

The purpose of this advisory is to inform pipeline operators and state pipeline safety program managers of a special notice issued by the Federal Railroad Administration (FRA) to railroad operators, and a safety recommendation issued by the National Transportation Safety Board (NTSB).

Advisory:

The presence of pipelines carrying natural gas or hazardous liquids on or near railroad rights-of-way creates a need for pipeline and railroad operators to coordinate emergency response planning and actions. Accordingly, the Federal Railroad Administration (FRA), in its manual "Hazardous Materials Emergency Response Plan Guidance Document for Railroads" (DOT/FRA/ORD-93/09, March 1993 revision), issued the following special notice on coordination between railroad and pipeline operators.

SPECIAL NOTICE

After the Association of American Railroads had completed their work on this guidelines document, it became evident that additional information should be included regarding pipelines that might be affected by a railroad accident. This "Special Notice" was developed by the Federal Railroad Administration and the Research and Special Programs Administration to respond to this need.

Pipelines in Railroad Rights-of-Way

Many railroad rights-of-way contain underground pipelines which carry hazardous materials.

These pipelines may be in a common right-of-way with the railroad, in a parallel right-of-way, or cross the railroad right-of-way. Pipelines may carry natural gas, crude oil, or petroleum products, including highly volatile liquids such as propane. These materials are often under high pressure.

A railroad incident which results in derailment, heavy equipment operations in the right-of-way, or any other disturbance of the right-of-way, has the potential of damaging underground pipelines. Derailed cars and engines can directly impinge on a pipeline. Loads imposed on a pipeline from a derailed train or cleanup equipment, or striking the pipeline with digging equipment can result in immediate or future failure. Therefore, the presence of underground pipelines carrying hazardous material must always be considered in responding to a rail incident. Railroads must actively coordinate their emergency response activities with pipeline operators to assess possible damage due to the incident and to prevent damage during response and cleanup operation.

Railroad emergency response plans should include information on underground pipelines which could be damaged by a rail incident. This information should include location, materials carried, and emergency numbers for the pipeline operator. Natural gas pipelines are operated under Federal Regulations 49 CFR Part 192; hazardous liquid pipelines are operated under 49 CFR Part 195.

In accordance with a safety recommendation from NTSB, pipeline operators having pipelines on or adjacent to railroad rights-of-way should discuss this "Special Notice" with those railroad operators to whom it applies, and mutually undertake development of plans for handling emergencies involving both rail and pipeline systems. Discussion should include information on how a pipeline can be damaged, how denting, gouging, and even surface damage that appears to be minor can lead to future failure, the serious consequences that can result from coating damage, and information to suggest possibilities for one-call systems to be a help on incidents involving both railroad and pipeline facilities. RSPA policy for Federal inspectors responding to a derailment that may impact a pipeline is to examine the condition of the right-of-way for indications of possible damage to the pipeline, including visual examination of the pipe and, if needed, excavation to expose it. Where warranted, RSPA policy also requires integrity testing (i.e., pigging with an instrumented internal inspection device or hydrostatic testing).

This notice will be discussed with state pipeline safety program managers at upcoming Federal/state pipeline safety meetings.

Background:

National Transportation Safety Board (NTSB) Safety Recommendation P-90-25 (issued in conjunction with NTSB Accident Report number NTSB/RAR-90/02 on the San Bernardino, CA, train derailment and petroleum pipeline rupture in May 1989) urges that operators of pipelines located on or adjacent to railroad operators in the development of plans for handling transportation emergencies that may impact both the rail and pipeline systems. In addition, P-90-25 recommends that the plan be discussed with affected state and local emergency response agencies.

In initial response to this recommendation, representatives of RSPA met with FRA representatives. The foregoing "Special Notice" was developed in the course of their discussions.

Issued in Washington, DC, on February 23, 1994.

George W. Tenley, Jr., Associate Administrator for Pipeline Safety